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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

DECLARATION OF JOSHUA S. GANS

1 I, Joshua S. Gans, declare and state as follows:

2 1. I am a Professor of Strategic Management and holder of the Jeffrey S. Skoll Chair of
3 Technical Innovation and Entrepreneurship at the Rotman School of Management, University of
4 Toronto. I am a Research Associate, National Bureau for Economic Research and a Research
5 Fellow, Center for Digital Business, Sloan School of Management, Massachusetts Institute of
6 Technology. I am also the Chief Economist at the University of Toronto's Creative Destruction Lab.
7 I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could
8 and would testify competently to such facts under oath.

9 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned
10 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' motion for
11 class certification.

12 3. Attached hereto are the two reports I have prepared in connection with this
13 assignment: the Expert Report of Joshua S. Gans (**Exhibit A**) and the Reply Report of Joshua S.
14 Gans (**Exhibit B**).

15 4. The attached reports accurately reflect my opinions on the matters contained therein.
16

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on 12 September 2023, in Toronto, Canada.

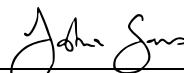
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21 
22 _____
23 Joshua S. Gans
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EXHIBIT A
[Filed Under Seal]

EXHIBIT B
[Filed Under Seal]